

THOMAS J. O'CONNOR  
PARTNER

80 STATE STREET  
ALBANY, NEW YORK 12207  
T 518.429.4200 • F 518.429.4201

DIRECT DIAL 518.429.4276  
DIRECT FAX 518.427.3474  
TOCONNOR@HBLAW.COM

August 23, 2011

Hon. Andrew T. Baxter  
United States Magistrate Judge  
United States District Court  
Northern District of New York  
100 S. Clinton Street  
P. O. Box 7367  
Syracuse, New York 13261-7367

RE: Laskowski, et al. v. Liberty Mutual Fire Insurance Company  
Case No. 5:11-CV-340

Dear Judge Baxter:

Please accept this letter as our request to extend the deadline for the Defendant's expert disclosure for two weeks beyond the current due date of August 29, 2011, and to further extend the Defendant's deadline for expert disclosure of its building damage expert until September 26, 2011. Plaintiffs may submit any rebuttal designation within three weeks of the service of any Defendant expert designation, and we further respectfully request a one-month extension of the discovery deadline, as well as all motion deadlines.

Opposing counsel has no objection to these requests.

Your consideration in this matter is greatly appreciated.

Respectfully submitted,

*Thomas J. O'Connor*

Thomas J. O'Connor

TJO:sbh

cc: Finley T. Harckham, Esq.  
Dennis J. Artese, Esq.  
Marc T. Ladd, Esq.  
Anderson Kill & Olick, P.C.  
1251 Avenue of the Americas  
New York, NY 10020